

1 Mark R. Vermeulen [CSBN 115381]  
 2 Law Office of Mark R. Vermeulen  
 3 755 Florida Street #4  
 4 San Francisco, CA 94110-2044  
 5 Phone: 415.824.7533  
 6 Fax: 415.824.4833

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 8 Attorney for Defendant  
 9 BERNADETTE ESCUE

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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

UNITED STATES OF AMERICA, ) No. CR 07-00610 JF  
 Plaintiff, )  
 v. ) **EX PARTE APPLICATION FOR ORDER  
 BERNADETTE ESCUE, ) PERMITTING TRAVEL; SUBMITTED  
 Defendant. ) WITH THE APPROVAL OF THE AUSA AND  
 ) PRETRIAL SERVICES; DECLARATION OF  
 ) COUNSEL  
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Defendant Bernadette Escue, through counsel, applies for permission to travel to and from Portland, Oregon for a job interview, traveling to Portland on January 14, 2008 and returning to the Bay Area on January 15, 2008.

This application is submitted after consultation with the supervising Pretrial Services Officer and the AUSA handling this matter, both of whom have informed counsel that they have no objection to this request.

This Application is based on the attached *Declaration Of Counsel*. A proposed order accompanies this application.

Dated: January 2, 2008

Respectfully submitted,

/S/  
 Mark R. Vermeulen  
 Attorney for Defendant  
 BERNADETTE ESCUE

## DECLARATION OF COUNSEL

I, Mark R. Vermeulen, declare:

1. I am an attorney duly admitted to practice before this Court and I represent Defendant Bernadette Escue in this action.

2. I request that Ms. Escue be permitted to travel to and from Portland, Oregon for a job interview on January 14-15, 2008.

3. I have spoken with Pretrial Services Officer Tim Elder, who is assigned to this case, and with Joe Fazioli, the AUSA handling this case, and they both have informed me that they have no objection to this request.

4. I will fax a copy of this *Application* and the accompanying *[Proposed] Order Permitting Travel* to Pretrial Services Officer Tim Elder on the same date I file this via ECF, and a copy of each will be provided to AUSA Joe Fazioli automatically via ECF filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 2, 2008 at San Francisco, CA.

/S/  
Mark R. Vermeulen